

Steven A. Kraemer, OSB No. 882476
E-mail: sak@hartwagner.com
Matthew J. Kalmanson, OSB No. 041280
E-mail: mjk@hartwagner.com
HART WAGNER LLP
1000 S.W. Broadway, Twentieth Floor
Portland, Oregon 97205
Telephone: (503) 222-4499
Facsimile: (503) 222-2301

Of Attorneys for Defendants

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

ORBITAL PUBLISHING GROUP, INC., a
New York corporation, and LIBERTY
PUBLISHERS SERVICE, INC., a New York
corporation,

No. 1:15-cv-00480-CL

Plaintiffs,

v.

**DECLARATION OF BRIDGET C.
WELLS IN SUPPORT OF MOTION TO
DISMISS**

BRIDGET WELLS, individually, and
PERIODICAL WATCHGUARD, LLC., a
North Carolina limited liability company,

Defendants.

I, Bridget Wells, declare as follows:

1. My name is Bridget Wells, and I am a Defendant in this lawsuit. I make this declaration based on personal knowledge.
2. I am a resident of Mint Hill, North Carolina. I do not own property in Oregon.
3. I am the sole owner of Defendant Periodical Watchguard LLC, a North Carolina LLC. Periodical Watchguard does not own property in Oregon or operate out of Oregon.

4. I have visited Oregon one time, on vacation to the Oregon coast over six years ago, for approximately two days.

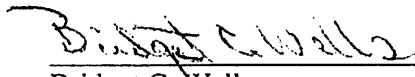
5. Regarding the allegations in the Complaint, to the best of my knowledge, I have never contacted an Oregon bank about Plaintiffs. I once testified as an expert witness in a case in Oregon involving a bank, at its request, but it was over the telephone, and the case did not involve these Plaintiffs. I also have sent cease and desist letters to a PO Box in Oregon on behalf of publisher clients, none of whom are located in Oregon.

6. I have spoken to representatives of the Oregon Department of Justice over the telephone about its ongoing investigation of Plaintiffs. At DOJ's request, in 2015 I agreed to be a witness in its civil racketeering lawsuit against Plaintiffs. This lawsuit was filed shortly thereafter. As of the date of this motion, I have not testified against Plaintiffs or participated in any judicial proceedings in Oregon about Plaintiffs.

7. It would be a significant burden on me to require me to litigate this case in Oregon.

8. I believe I was personally served in this matter on May 7, 2015.
Pursuant to 28 USC §1746, I declare under penalty of perjury that the foregoing is true and correct.

DATED the 19 day of June 2015.



Bridget C. Wells